

LUKAS, NACE GUTIERREZ & SACHS

CHARTERED

1650 TYSONS BOULEVARD, SUITE 1500

MCLEAN, VIRGINIA 22102

703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

RUSSELL D. LUKAS*
DAVID L. NACE*
THOMAS GUTIERREZ*
ELIZABETH R. SACHS*
GEORGE L. LYON, JR.
PAMELA L. GIST*
DAVID A. LAFURIA
B. LYNN F. RATNAVALE*
TODD SLAMOWITZ*
STEVEN M. CHERNOFF*

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEROY A. ADAM
LEILA REZANAVAZ
SUMEET K. BHALOTIA
—
OF COUNSEL
JOHN J. MCAVOY*
J.K. HAGE III*
LEONARD S. KOLSKY*
HON. GERALD S. MCGOWAN*

*NOT ADMITTED IN VA

Writer's Direct Dial:
(202) 828-9470
tgutierrez@fcclaw.com

June 14, 2007

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Ex Parte Notice
WC Docket No. 05-337; CC Docket No. 96-45**

Dear Ms. Dortch:

On June 11, 2007, Ms. Darla Pomeroy; Msrs. Wayne Perry, Donnie Castlemen and Kevin Keillor; and the undersigned, all representing Edge Mobile Wireless ("Edge"), met with Mr. Scott Bergmann of Commissioner Adelstein's office and discussed matters in the enclosed handout.

Pursuant to 47 C.F.R. § 1.1206(b)(2), this notice is being submitted electronically in the above-referenced docket. In addition, one copy of this notice is being transmitted via e-mail to Mr. Bergmann.

Very truly yours,

/s/ Thomas Gutierrez
Counsel for Edge Wireless, LLC

Enclosure

cc: Scott Bergmann, Esq.

EDGE WIRELESS, LLC

EFFECT OF THE PROPOSED USF CAP ON WIRELESS DEPLOYMENT IN RURAL OREGON AND IDAHO

June 11, 2007

1. Edge Wireless, LLC opposes the interim cap proposed by the Joint Board because it will delay deployment of advanced wireless communications to rural areas and is unfairly penalizes states like Oregon and Idaho.
2. Edge Wireless is a PCS carrier that operates a GSM/GPRS/EDGE network in rural portions of Oregon, California, Idaho and Wyoming, and is headquartered in Bend, OR.
3. Edge was formed as a small business designated entity. By state the largest cities in our service area are Grants Pass (pop. 23,000) in Oregon, Eureka (pop. 26,000) in California, Pocatello (pop. 51,000) in Idaho, and Jackson (pop. 9,000) in Wyoming.
4. Members of the Edge Wireless management team are in Washington D.C. to attend the CTIA – Wireless Foundation VITA Awards Dinner where two Edge Wireless employees, Eric Fuqua and Noah Pugsley, are being honored for their use of wireless technology to help locate the James Kim family last December.
5. The Kim family had cell phones with them, but there was no coverage in the area where they became stuck. Although the area is sparsely populated and the terrain is rugged, they were less than 20 miles as the crow flies from Interstate 5, the primary north-south interstate on the west coast.
6. Edge's territory in Oregon and Idaho are full of very rural areas populated by farmers, ranchers, and small towns where economic development is hindered and public safety is compromised by the lack of wireless communications. The high cost component of the Universal Service Fund is critical to Edge's ability to provide service to these portions of our market.

OREGON

7. Edge Wireless was granted ETC status in by the Oregon PUC in August 2005. USF funding enabled Edge to build 12 new cell sites and improve capacity in approximately 30 others in the last half of 2005 and 2006. These new sites shown on the map attached as Exhibit 1.
8. Many sites, like Diamond Lake, would never have been built without USF support and have provided critical wireless communications to this year-round recreation area and a heavily used mountain pass.

9. Oregon received under \$10 million in high cost funding for CETCs in 2006, shared by US Cellular, Rural Cellular Corporation and Edge Wireless. This amount will now be shared by at least one additional CETC and possibly more, so Edge will see its funding reduced by at least 35%.

10. Edge's Oregon network improvement plan for 2007 and 2008 call for the construction of 16 new cell sites, and capacity improvements at approximately 35 other sites. These new sites and the coverage they will provide are shown on the map attached as Exhibit 2.

11. An example of two sites that may not survive the cap are Peavine Mountain, a site that the BLM requested to cover the area where the Kim family was lost, and Agness which is at the west end of the wild and scenic section of the Rogue River. See Exhibit 2. Although these sites would provide a significant public safety benefit to an area that is currently not served by wireless, the population served is small compared to other sites on the ETC list.

IDAHO

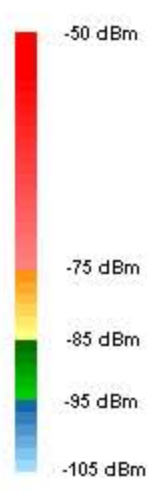
12. Edge Wireless anticipates being granted ETC status by the Idaho PUC in June 2007, and will be the first CETC approved by the Idaho PUC for high cost funding. The proposed cap would result in Idaho receiving no high cost support for CETCs.

13. Edge's Idaho network improvement plan for 2007 and 2008 call for the construction of 21 new cell sites, and capacity improvements at approximately 30 other sites. These sites and the coverage they will provide is shown on the map attached as Exhibit 3.

14. Communities that will be denied the benefit of advanced wireless service include large farming, ranching and mining interests, as well as heavily used recreational areas.

SUMMARY

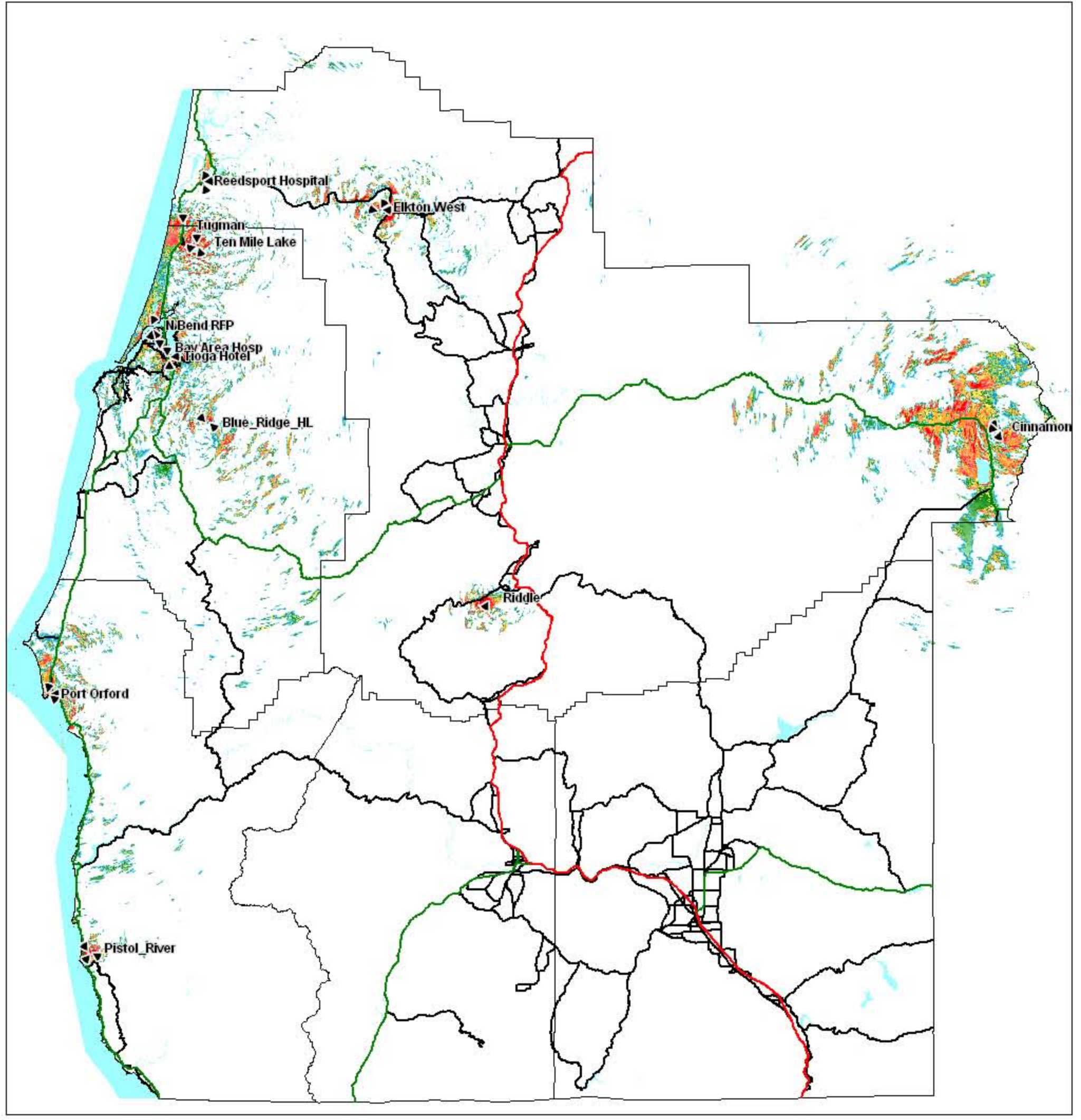
15. The proposed cap will deny the economic and public safety benefits of mobile wireless service to significant portions of southern Oregon and eastern Idaho. It will also perpetuate the existing inequity in CETC funding among the states. As shown on Exhibit 4, Oregon and Idaho have significant gaps in coverage yet will receive little or no support under the cap, while many states in the top tier of CETC funding have already achieved almost universal coverage. Edge Wireless encourages you to oppose the proposed cap.



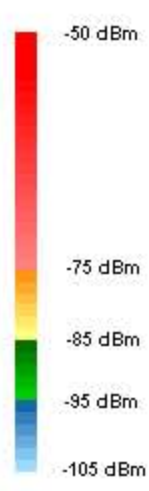
05-06 ETC sites Edge Wireless GSM Network

This map is not a representation of actual wireless coverage. Actual coverage depends on system availability, system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions.

Future Coverage areas are based on current build out plans and are subject to change.



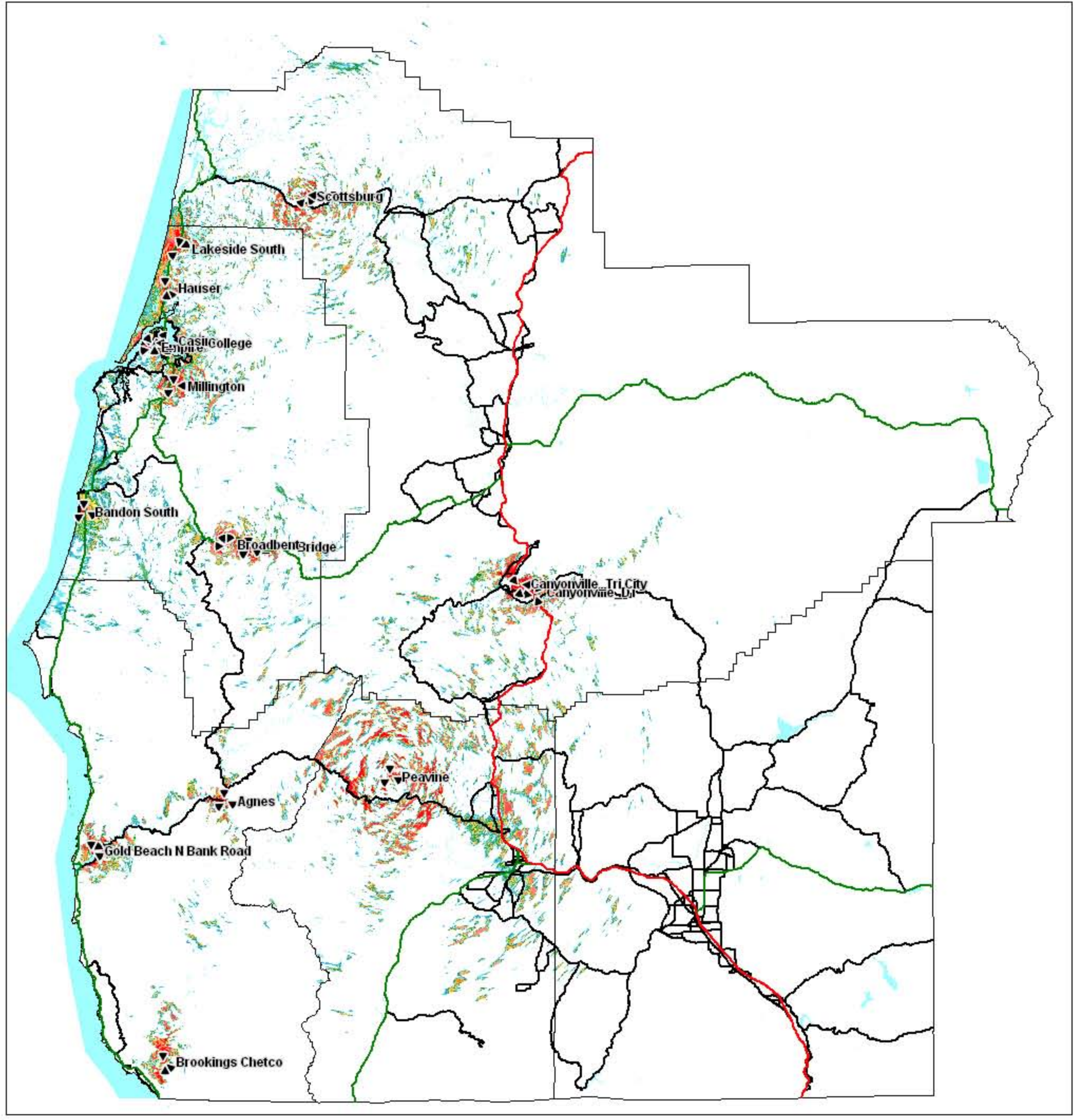
edge WIRELESS®



07-08 ETC sites Edge Wireless GSM Network

This map is not a representation of actual wireless coverage. Actual coverage depends on system availability, system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions.

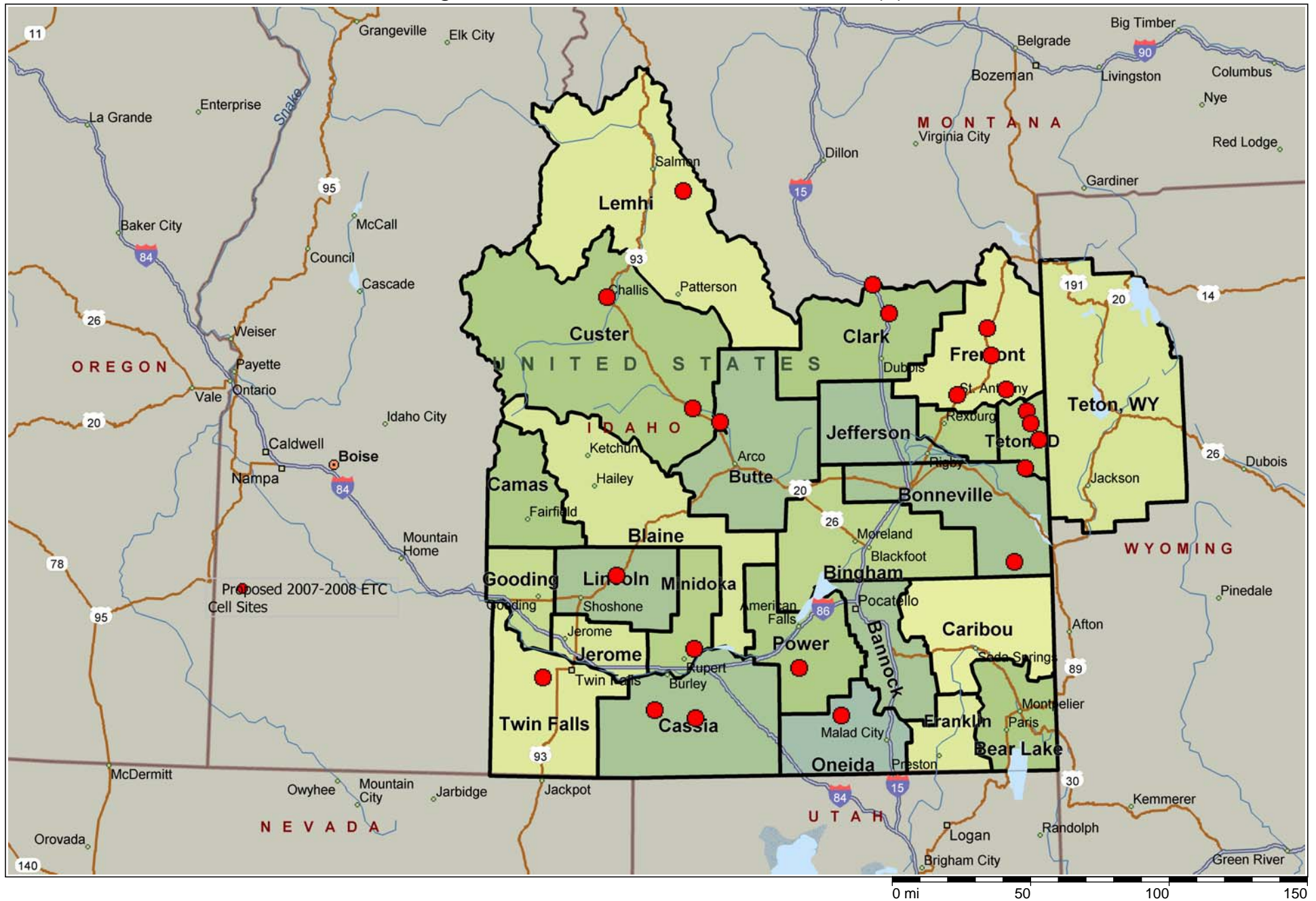
Future Coverage areas are based on current build out plans and are subject to change.



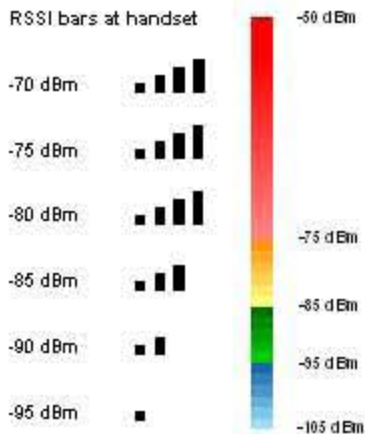
Edge Wireless Oregon Licensed Territories



Edge Wireless Idaho Licensed Territories (2)



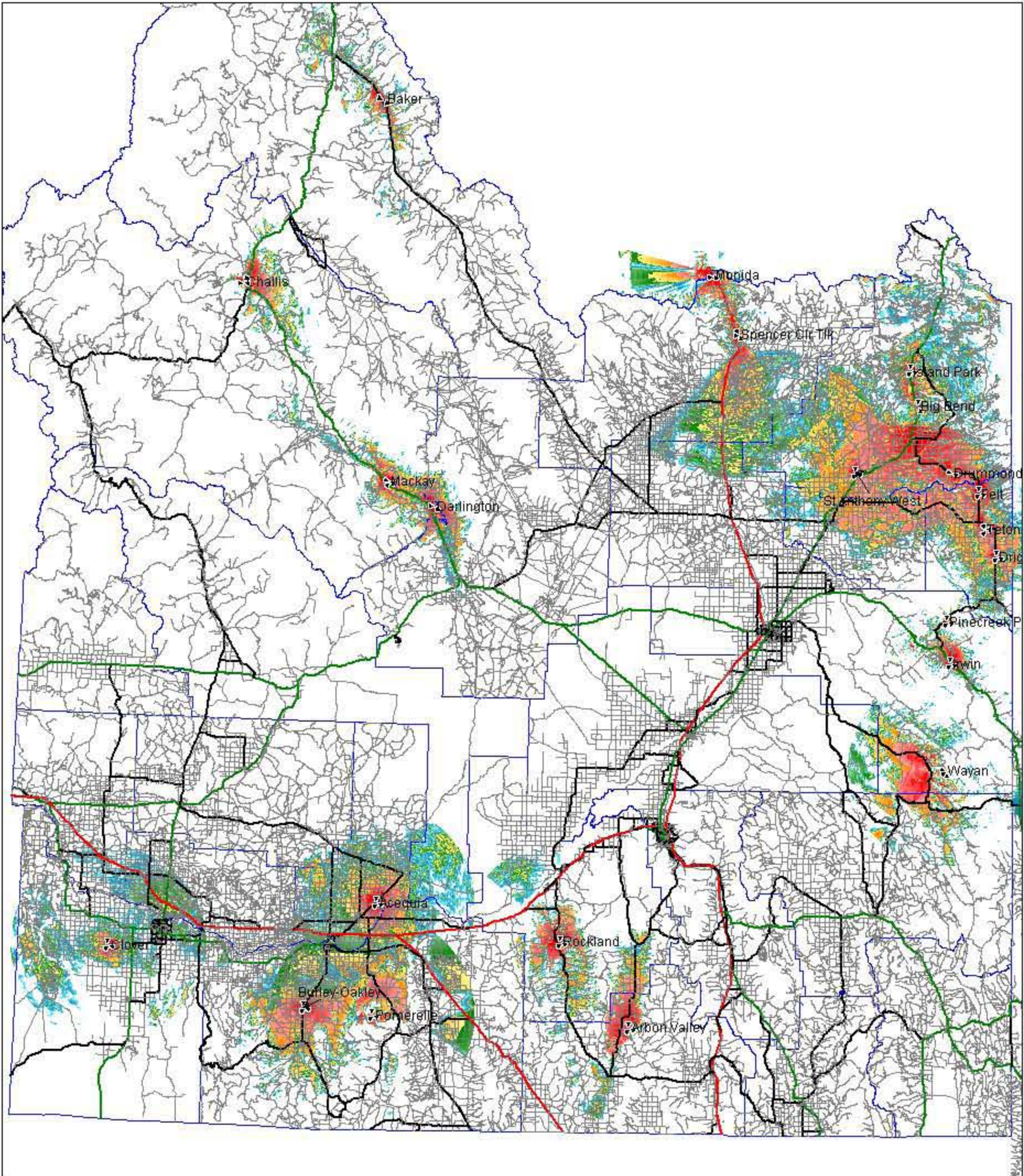
edge WIRELESS®

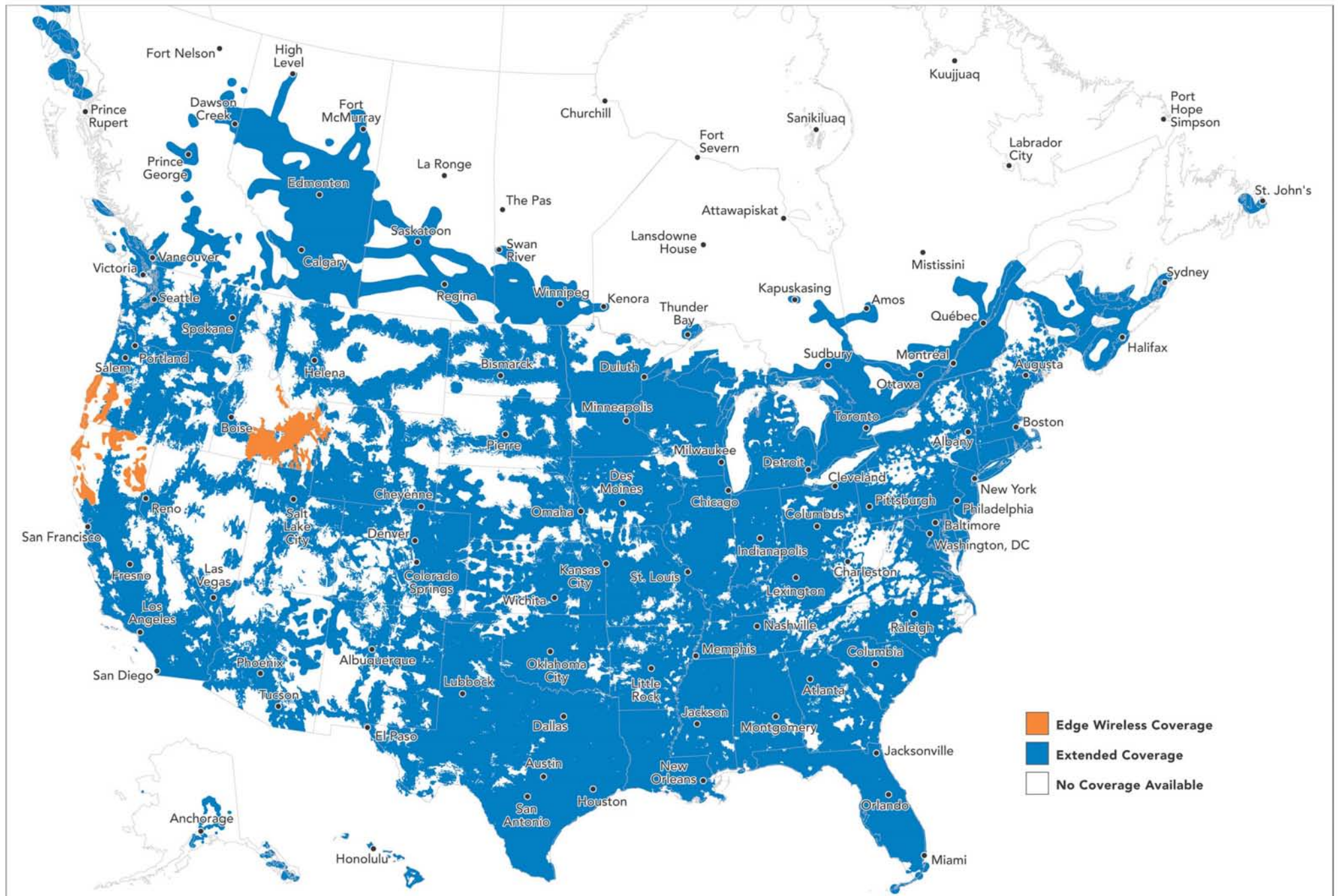


ETC sites Edge Wireless GSM Network

This map is not a representation of actual wireless coverage. Actual coverage depends on system availability, system capacity, system repairs and modifications, customer's equipment, terrain, signal strength, weather and other conditions.

Future Coverage areas are based on current build out plans and are subject to change.





Disclaimer disclaimer dis claim er. Lai merdi sclai merdi Scla I merdiscla imer. Disclaim erdis merdi sclai merdi Scla I merdisc laimer merdi sclai merdi Scla I mer disclaim erme rdi sclai merdi Scla I merdiscla imermerdi sclai merdi Scla I merdiscla imermerdi sclai merdi Scla I merdiscla imer. Disclaimer disclaimer dis claim er. Lai merdi sclai merdi Scla I merdiscla imer. Disclaim erdis merdi sclai merdi Scla I merdisc laimer merdi sclai merdi Scla I mer disclaim erme rdi sclai merdi Scla I merdiscla imermerdi sclai merdi Scla I merdiscla imermerdi sclai merdi Scla I merdiscla imer. Disclaimer disclaimer dis claim er. Lai merdi sclai merdi Scla I merdiscla imer. Disclaim erdis merdi sclai merdi Scla I merdisc laimer merdi sclai merdi Scla I mer disclaim erme rdi sclai merdi Scla I merdiscla imermerdi sclai merdi Scla I merdiscla imermerdi sclai merdi Scla I merdiscla imer. Disclaimer disclaimer dis claim er. Lai merdi sclai merdi Scla I merdiscla imer. Disclaim erdis merdi sclai merdi Scla I merdisc laimer merdi sclai merdi Scla I mer disclaim erme rdi sclai merdi Scla I merdiscla imermerdi sclai merdi Scla I merdiscla imermerdi sclai merdi Scla I merdiscla imer.